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VIA ECF

February 2, 2021

The Honorable George B. Daniels  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03-md-1570 (S.D.N.Y.)  
(GBD) (SN); *Estate of John P. O'Neill, Sr. v. Al Baraka Inv. & Dev.*  
*Corp.*, 04-cv-1923 (S.D.N.Y.) (GBD) (SN)

Dear Judge Daniels:

In light of the multitude of currently pending matters in this multi-district litigation, including ongoing fact depositions of Saudi witnesses, expert discovery, the Republic of Sudan Motion to Dismiss briefing, and redactions to eleven outstanding motions, along with the ongoing logistical challenges caused by the COVID-19 pandemic, *O'Neill* Plaintiffs request an extension of time to file Objections to the Report and Recommendation, dated January 22, 2021 (ECF No. 6601). Objections are currently due February 5, 2021, and neither party has previously requested an adjournment or extension of this deadline. *O'Neill* Plaintiffs propose the following briefing schedule with the consent of *al Baraka* Defendants:

By Monday, March 8, 2021, *O'Neill* Plaintiffs may file Objections to the Report and Recommendation, dated January 22, 2021 (ECF No. 6601).

By Wednesday, April 7, 2021, *al Baraka* Defendants may file their Opposition to Plaintiffs' Objections to the Report and Recommendation.

By Wednesday, April 21, 2021, *O'Neill* Plaintiffs may reply to Defendants' Opposition.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Jerry S. Goldman

Jerry S. Goldman

cc: The Honorable Sarah Netburn, U.S. Magistrate Judge, via ECF  
All Counsel of Record, via ECF  
Plaintiffs' Executive Committees, via email

New York, NY ■ Los Angeles, CA ■ Stamford, CT ■ Washington, DC ■ Newark, NJ ■ Philadelphia, PA